

## Telecommunications Advisors

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February 11, 2008

Cimarron Telephone Company P. O. Drawer 160 Mannford, OK 74044-160

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

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RE: EB Docket No.06-36

Via: ECFS

Dear Secretary Dortch:

Pursuant to 47 CFR 64.2009(e); please find the accompanying annual CPNI certification and statement for calendar year 2007 for Cimarron Telephone Company form 499 filer ID number 803253.

Should you have any questions regarding this filing, please direct them to the undersigned.

Best Regards

Keith Gile Consultant

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Byron McCoy, Telecommunications Consumer Division, Enforcement Bureau via email byron.mccoy@fcc.gov

Best Copy Printing via email FCC@BCPIWEB.COM

## Certification of CPNI Filing 12/31//2007

EB Docket No. 06-36 EB-06-TC-060

I, Dawn EllCarson and I, Lou Farrow , hereby certify for calender year 2007 that we are co-CPNI Compliance officer's of Cimarron Telephone Company, Inc. and that we have personal knowledge that Cimarron Telephone Company, Inc. has established operating procedures that are to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C F.R §§ 64.2001-2011

Dawn EllCarson	Lou Farrow
Officer's Name	Officer's Name
CPNI Compliance Officer	CPNI Compliance Officer
Title	Title
Daunell Carson	Low Farrow_
Signature	Signature
01-31-08	1-31-08
Date	Date

## Cimarron Telephone Company, Inc. STATEMENT OF COMPLIANCE WITH CPNI 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011 EB Docket No. 06-36

Cimarron Telephone Company, Inc. (Cimarron) has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of consumer proprietary network information (CPNI).

- Cimarron has implemented internal procedures to educate and train employees about CPNI and the
  disclosure of CPNI. Cimarron has established disciplinary procedures for any employee that
  wrongfully discloses CPNI.
- Cimarron does not use CPNI without customer notification as set forth by the FCC in 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011. Cimarron provides either an opt-in notice or an opt-out notice when appropriate and maintains the customers choice. Therefore, the customers approval status can be determined prior to use of CPNI.
- Cimarron maintains records of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. Also, Cimarron does not currently allow access to third parties for marketing purposes but will obtain Op in approval from customers for which it may allow third party access. Cimarron will maintain records anytime third parties are allowed access to CPNI. Records of their own marketing, thier affliate's marketing or any third party relase, include a description of each campaign, the specific CPNI that was used, and what products and services were offered. These records are retained for a period of at least one year.
- Cimarron requires sales personnel to obtain supervisory approval of all outbound marketing requests for customer approval and maintains records of compliance for at least one year.
- Cimarron will provide written notice within five business days to the FCC any instance where the optout methods do not work properly, to such a degree that the customers inablility to opt-out is more than an anomaly.

Cimarron did not experience any apparent attempts by data brokers to obtain CPNI and therefore did not take any action against data brokers during the calender year ended December 31, 2007.

Cimarron did not receive any apparent customer complaints concerning the unauthorized release of CPNI for the calender year ended December 31, 2007.